

ORIGINAL 2 to Crw/0
IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

(16) pm
3/4/02

BARBARA A. WILHELM,
Plaintiff

v.

COMMONWEALTH OF PA.;
PENNSYLVANIA STATE POLICE;
COLONEL PAUL J. EVANKO,
COMMISSIONER; LIEUTENANT
COLONEL THOMAS K. COURY; and
CAPTAIN MICHAEL. D. SIMMERS,
Defendants

NO. 1:CV-01-1057

(JUDGE RAMBO)

FILED
HARRISBURG

MAR 01 2002

MARY E. D'ANDREA, CLERK
Per. 9/5
DEPUTY CLERK

DEFENDANTS' UNOPPOSED MOTION TO
ENLARGE THE DEADLINE FOR FILING
DISPOSITIVE MOTIONS

Pursuant to Fed.R.Civ.P. 6(b), defendants hereby move the Court to enlarge the deadline for filing dispositive motions until April 15, 2002. In support of this motion defendants state as follows:

1. This case alleges employment discrimination and retaliation against the Pennsylvania State Police and three current or former State Police officers.
2. This case is presently on the June 2002 trial list with a discovery deadline of February 28 and a dispositive motions deadline of March 15.
3. Today, plaintiff with the concurrence of defendants moved to

enlarge the discovery period until March 30, 2002.


4. If the Court grants that motion without also extending the dispositive motion deadline, such motions would have to be filed before discovery is completed.

5. By this motion, defendants are requesting the Court to extend the deadline for filing dispositive motions until April 15, 2002, if the motion to extend discovery is granted.

WHEREFORE, defendants respectfully request the Court to enlarge the deadline for filing dispositive motions until April 15, 2002.

Respectfully submitted,

D. MICHAEL FISHER
Attorney General

BY: 
SUSAN J. FORNEY
Chief Deputy Attorney General
I.D. No. 27744

Office of Attorney General
Litigation Section
15th Floor, Strawberry Square
Harrisburg, PA 17120
(717) 787-9831

DATED: March 1, 2002

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CERTIFICATE OF CONCURRENCE

Counsel for defendants called counsel for plaintiff to obtain his
concurrence in the foregoing motion, which he gave.


SUSAN J. FORNEY
Chief Deputy Attorney General

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(JUDGE RAMBO)

CERTIFICATE OF SERVICE

I, **SUSAN J. FORNEY**, Chief Deputy Attorney General for the
Commonwealth of Pennsylvania, hereby certify that on March 1, 2002, I caused to
be served by first class mail a copy of the foregoing upon the following:

Nathan C. Pringle, Jr., Esquire
3601 North Progress Ave., Suite 200
Harrisburg, PA 17110


SUSAN J. FORNEY
Chief Deputy Attorney General
I.D. No. 27744